

1 Honorable Marsha J. Pechman  
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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

9 DYLON DYKSTRA, individually and on  
10 behalf of all others similarly situated,

11 Plaintiff,

12 v.

13 THE SHIELD CO MANAGEMENT, LLC  
14 DBA ECOSHIELD MANAGEMENT CO,  
15 LLC, an Arizona limited liability corporation;  
and DOES 1-20,

16 Defendants.

No. 2:23-cv-01908-MJP

**JOINT STATUS REPORT AND  
STIPULATED MOTION TO REMAND  
AND ~~PROPOSED~~ ORDER**

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18 Plaintiff Dylon Dykstra and Defendant The Shield Co Management, LLC DBA Ecoshield  
19 Management Co (collectively, the “Parties”), by and through their undersigned counsel,  
20 respectfully submit this Joint Status Report and Stipulated Motion to Remand in accordance with  
21 the Court’s Order Extending Stay, ECF No. 23.

22 The Parties participated in mediation with Clifford Freed of Washington Arbitration &  
23 Mediation Services on August 22, 2024. The Parties agreed to settle the action and executed a CR  
24 2A Agreement outlining the settlement terms. One such settlement term is remand to state court.  
25 As such, the Parties respectfully request that this action be remanded to King County Superior  
26 Court for completion of a class-wide settlement.

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JOINT STATUS REPORT AND STIPULATED MOTION  
TO REMAND AND ~~PROPOSED~~ ORDER - 1

No. 2:23-cv-01908-MJP

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1                   **[PROPOSED] ORDER**

2                   Upon consideration of the Parties' Stipulated Motion to Remand, the Court finds that good  
3 cause exists to remand this action to King County Superior Court.

4                   It is hereby ORDERED that this Stipulated Motion to Remand is GRANTED and that this  
5 action be remanded to King County Superior Court.

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7                   Dated this 10th day of September, 2024.

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11                  Marsha J. Pechman  
12                  United States Senior District Judge

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14                  Presented by:

15

16                  EMERY | REDDY PLLC

17                  By: /s/ Timothy W. Emery

18                  By: /s/ Patrick B. Reddy

19                  By: /s/ Paul Cipriani

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JOINT STATUS REPORT AND STIPULATED MOTION

TO REMAND AND **[PROPOSED] ORDER** - 3

No. 2:23-cv-01908-MJP

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